

EXHIBIT B

From: [Matthias, Michael](#)
To: [Brian Neville](#); [Barry Lax](#)
Cc: [Steven Davis](#); [Mary Grace White](#)
Subject: RE: APN 10-05169 Fairfield Pagma Associates, LP
Date: Thursday, March 9, 2017 6:57:01 PM

Brian,

Thanks for your quick response.

I am in communication with Mr. Miller. He has asked me to consider dismissing Seymour Kleinman and Seyfair LLC, but has not mentioned any of the other defendants. I am actually in the process of preparing a response to his request, which reminded me of the adversary proceeding and prompted my email to you.

Let's give it a couple of weeks and see where my discussions with Mr. Miller lead. I will not take any action with respect to the discovery without another 15 day notice to you and hopefully we can figure something out.

Michael

From: Brian Neville [mailto:bnevile@laxnevile.com]
Sent: Thursday, March 09, 2017 3:44 PM
To: Matthias, Michael; Barry Lax
Cc: Steven Davis; Mary Grace White
Subject: RE: APN 10-05169 Fairfield Pagma Associates, LP

Michael,

We have not been able to communicate with our client. As you know Seymour Kleinman died some time ago. The last time I was able to get his daughter on the phone she screamed at me to stop doing work for the case and hung up on me. If we cannot communicate with our clients, we will need to set a call with the court in an effort to resolve this matter. I know a lawyer by the name of Yoram Miller is trying to help them, but he has not appeared. We cannot respond to discovery without communication from a client. Sorry, it seems we will have to involve the court. We have been trying to withdraw from the case for two years.

Brian J. Neville

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From: Matthias, Michael [<mailto:mmatthias@bakerlaw.com>]

Sent: Thursday, March 09, 2017 6:19 PM

To: Barry Lax <blax@laxnevile.com>; Brian Neville <bneville@laxnevile.com>

Subject: FW: APN 10-05169 Fairfield Pagma Associates, LP

Barry and Brian,

Responses to the discovery served in this matter on January 25, 2017 are past due. Please be advised that if we are not in receipt of responses, without objections which are deemed waived as a result of the failure to timely respond, by March 17, 2017 we will have no alternative other than to file a motion with respect thereto. If that is necessary please let us know whether you will agree to any discovery motion being heard by Judge Maas, the Discovery Arbitrator appointed by Judge Bernstein in this matter.

Michael

Michael R. Matthias

BakerHostetler

mmatthias@bakerlaw.com

310.442.8802

From: Matthias, Michael

Sent: Wednesday, January 25, 2017 4:11 PM

To: Barry Lax (blax@laxnevile.com); 'bneville@laxnevile.com'

Subject: APN 10-05169 Fairfield Pagma Associates, LP

Barry and Brian,

Attached for service are:

1. Trustee's First Set of Interrogatories to Defendant Fairfield Pagma Associates, LP;
2. Trustee's First Set of Requests for Production of Documents to Defendant Fairfield Pagma Associates, LP;
3. Trustee's First Set of Requests for Admission to Defendant Fairfield Pagma Associates, LP; and
4. Trustee's First Set of Requests for Production of Documents to Defendant Estate of Marjorie Kleinman A/K/A Marjorie Helene Kleinman, Bonnie Joyce Kansler, as Executor.

Copies will also be serve by First Class mail.

Michael

Michael Matthias

Partner

BakerHostetler

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